

## **Requirements to Remember for ADA Compliance in Construction Projects**

The ADA Standards issued by the Department of Transportation (DOT) apply to facilities used by state and local governments to provide designated public transportation services, including bus stops and stations, and rail stations. Other types of facilities covered by the ADA are subject to similar [ADA Standards](#) issued by the Department of Justice. Both the DOT and DOJ standards are based on the Board's ADA Accessibility Guidelines.

DOT's ADA Standards (2006) are consistent with the Access Board's updated ADA (and ABA) guidelines but includes a few additional requirements concerning:

- Location of Accessible Routes (206.3)
- Detectable Warnings on Curb Ramps (406.8)
- Bus Boarding and Alighting Areas (810.2.2)
- Rail Station Platforms (810.5.3)

**The complete ADA Standards for Transportation Facilities can be found at the US Access Board Website: ([ADA Standards for Transportation Facilities](#))**

### ***Requirements to Remember for: New Construction of Facilities***

Sixty percent of all public entrances to the facility must be accessible. If there are only two entrances, both must be accessible. ([DOT ADA Standard 206.4.1.](#))

For rail projects, no flange way gap can be greater than 2.5" where passenger circulation paths cross tracks at grade (i.e. a street-level pedestrian crossing over streetcar tracks). ([DOT ADA Standard 810.10.](#))

Accessible routes that coincide with or are located in the same area as general circulation paths and elements such as ramps, elevators, and fare vending and collection must be placed to minimize the distance that wheelchair users and other persons who cannot climb steps must travel in comparison to the general public. ([DOT ADA Standard 206.3.](#))

Curb ramps must have detectable warnings. ([DOT ADA Standard 406.8.](#))

Bus boarding and alighting areas must be in compliance with the ADA-ABA Guidelines ( [Section 810.2](#)), which address surfaces (sturdy), dimensions (96" long x 60" wide); connection to sidewalks, streets and pedestrian paths; slope (not steeper than 1:48); signs; and public address systems. ([DOT ADA Standard 810.2.](#))

Station platforms must be coordinated with the vehicle floor height. ([DOT ADA Standard 810.5.3.](#))

### ***Requirements to Remember for: Alterations or Additions to Facilities***

Altered or added portions of the facility must be made accessible. ([DOT ADA Standard 201](#) and [DOT ADA Regulation 49 C.F.R. 37.43\(a\)\(1\).](#))

The path of travel to the altered or added portion of the facility must be made accessible, to the maximum extent feasible. ([DOT ADA Regulation 49 C.F.R. 37.43\(a\)\(2\)](#) and [DOT ADA Standard 202.3.](#))

If the path of travel cannot be made accessible, you must submit to FTA an analysis demonstrating that the cost of making the path of travel accessible is disproportionate to (i.e., > 20%) the cost of the alterations or additions to the primary function area. ([DOT ADA Standard 202.4](#) and [DOT ADA Regulation 49 C.F.R. 37.43\(e\)\(1\).](#))

If the path of travel cannot be made accessible, you must submit to FTA an analysis demonstrating that site-specific conditions prevent you from making the path of travel accessible. Include relevant diagrams and maps. ([DOT ADA Standard 202.4](#) and [DOT ADA Regulation 49 C.F.R. 37.43\(b\).](#))

### ***Requirements to Remember for: Commuter Rail Projects***

Wheelchair users must have access to all accessible cars available to passengers without disabilities in each train using the station. ([DOT ADA Regulation 49 C.F.R. 37.42.](#))

### ***Requirements to Remember for: Bus Rapid Transit Systems***

ADA standards apply to buses and bus boarding and alighting areas as well as BRT vehicles and stops/stations. ([DOT ADA Regulation 49 C.F.R. Part 38, Subpart B](#) and [DOT ADA Standard 810.](#))

If not using a lift or ramp to provide level boarding, you must submit to FTA a demonstration of equivalent facilitation. ([DOT ADA Regulation 49 C.F.R. 37.7\(b\)](#) and [DOT ADA Regulation 49 C.F.R. 38.2.](#))

If roadways are being resurfaced or otherwise altered as part of a BRT project, curb ramps must be installed at crosswalks that have been affected. ([DOT ADA Standard 106.5.](#))

### ***Requirements to Remember for: Light Rail Projects***

Complimentary paratransit service must be provided for fixed-route systems. ([DOT ADA Regulation 49 C.F.R. Part 37, Subpart F.](#))

### ***Requirements to Remember for: Remanufacture or Overhaul of Vehicles***

Remanufactured or overhauled vehicles must be accessible. ([DOT ADA Regulation 49 C.F.R. 37.75](#); [DOT ADA Regulation 49 C.F.R. 37.83](#); and [DOT ADA Regulation 49 C.F.R. 37.89.](#))

If a remanufactured or overhauled vehicle will not be accessible, submit information to FTA demonstrating that the structural integrity of the vehicle would be significantly compromised if made accessible. Include an appropriate structural engineering analysis. ([DOT ADA Regulation 49 C.F.R. 37.75 \(c\)](#); [DOT ADA Regulation 49 C.F.R. 37.83\(c\)](#) and [DOT ADA Regulation 49 C.F.R. 37.89\(c\).](#))